

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

§
§
§
§
§
§
§
§
§
§

Case No. 3:21-cv-00259
[Lead Case]

ROY CHARLES BROOKS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

§
§
§
§
§
§
§
§
§
§

Case No. 1:21-cv-00988
[Consolidated Case]

DEFENDANTS' DESIGNATION OF POTENTIAL WITNESSES

Pursuant to the Court's Scheduling Order of December 17, 2021, *see* ECF 97, Defendants submit the following list of potential witnesses for the hearing on the Brooks Plaintiffs' preliminary-injunction motion, scheduled for January 25, 2022.

Witnesses
Senator Joan Huffman
Representative Phil King
Senator Beverly Powell
Senator Kel Seliger
Kevin Sparks

Todd Giberson
Keith Ingram, Elections Division Director, Texas Secretary of State
Bruce Sherbet, Collin County Elections Administrator
Staci Decker, Kendall County Elections Administrator
David Blackburn, County Judge, Bell County

Expert Witnesses
Dr. John R. Alford

Defendants reserve the right to supplement this list, the right to call any witness on the Brooks Plaintiffs' witness list, the right to call rebuttal witnesses not listed here, and the right to call witnesses for the purpose of authenticating any exhibits.

Date: January 14, 2022

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Tex. State Bar No. 00798537

BRENT WEBSTER
First Assistant Attorney General

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Tex. State Bar No. 24088531

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410
patrick.sweeten@oag.texas.gov
will.thompson@oag.texas.gov

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 14, 2022, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN